

unreasonable financial burden on undersigned counsel based on outstanding attorney's fees.¹

See Tex. Disc. R. Of Prof. Conduct § 1.15 (b)(5)-(7); *see also Cal. R. of Prof. Conduct* § 1.

16(b)(4)-(5). In July 2024, Counsel informed Defendant of her intention to withdraw as counsel based on the outstanding financial obligation, and provided Defendant with an opportunity to secure substitute counsel. To date, Defendant has not provided undersigned counsel with information regarding substitute counsel, and thus in compliance with Local Rule AT-3 provides the following contact information regarding client, Benjamin Todd Eller: 800-598-7889; 364 West Wilson Avenue, Suite 5, Glendale, California 91203.

Thus, for the reasons set forth in, permissive withdrawal is appropriate, and undersigned counsel respectfully requests a Court Order allowing such withdrawal.

DATED: August ___, 2024

*Presented to client for signature per Local Rule AT-3,
but no signature has been received as of the time of filing.

Benjamin Todd Eller

DATED: August 26, 2024

/s/ Indira J. Cameron-Banks

Indira J. Cameron-Banks
(appearing *pro hac vice*)

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Attorneys For DEFENDANT
Benjamin Todd Eller

¹ This motion also seeks the withdrawal of local counsel, Jeremy Sloan, of Sloan PLLC.

Having reviewed and considered the *Application to Withdraw as Counsel for Benjamin Todd Eller*, and finding good cause therefor, IT IS HEREBY ORDERED AND DECREED that counsel Indira J. Cameron-Banks of Cameron Jones LLP, and local counsel Jeremy Sloan of Sloan PLLC are hereby relieved as counsel of record for Defendant Benjamin Todd Eller.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE FRED BIERY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2024, a true and accurate copy of APPLICATION TO WITHDRAW AS COUNSEL FOR BENJAMIN TODD ELLER was electronically served on counsel of record via CM/ECF, and was placed in an envelope with postage fully prepaid thereon in the United States mail within Los Angeles County, California to be served on Benjamin Todd Eller by delivery to 364 W. Wilson Ave., Ste. 5, Glendale, California 91203.

/s/ Indira J. Cameron-Banks

Indira J. Cameron-Banks